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**The Honorable Michael H. Simon**

Attorney for Plaintiff Riley Poor

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

RILEY POOR,  
Plaintiff,

vs.

FRONTIER AIR LINES, Inc.,  
Defendant.

No. 3:13-cv-00107-SI

JOINT MOTION FOR MODIFICATION  
OF PRETRIAL DATES

I. RULE 7-1(a)(1)(A) CERTIFICATION.

The parties have conferred pursuant to Rule 7-1(a)(1)(A) and join in the following motion for modification of the pretrial dates.

II. MOTION FOR MODIFICATION OF PRETRIAL DATES.

The parties jointly move for a modification of the pretrial dates as shown below. The parties have substantially completed written discovery and have conferred regarding the depositions to be taken. The modification of dates outlined below will permit the efficient conclusion of document production and scheduling of depositions, and for those reasons the parties ask that the court adjust the pretrial schedule as follows.

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DATES

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Event	Current Date	Proposed New Date
Fact Discovery Closes	June 28, 2013	September 28, 2013
Plaintiff's Expert Disclosure Due	July 26, 2013	October 27, 2013
Defendant's Expert Witness Disclosure and Reports Due	September 27, 2013	December 27, 2013
Plaintiff's Rebuttal Expert Disclosure and Reports Due	November 27, 2013	January 27, 2014
Joint Status Report Due	January 10, 2014	February 10, 2014
Dispositive Motions Due	January 10, 2014	February 10, 2014

Respectfully submitted May 23, 2013

BRIAN T. MAYE  
/s/ Brian T. Maye  
 Brian T. Maye (*Pro Hac Vice*)  
 Adler Murphy & McQuillen LLP  
 Of Attorneys for Defendant Frontier Air  
 Lines, Inc

JAMES F. HALLEY, P.C.  
/s/ James F. Halley  
 James F. Halley, OSB #91-175  
 Trial Attorney for Plaintiff Riley Poor

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2013, I served the attached JOINT MOTION FOR MODIFICATION OF PRETRIAL DATES on:

Brian T. Maye  
**ADLER MURPHY & McQUILLEN LLP**  
20 S. Clark, Suite 2500  
Chicago, Illinois 60603

**Timothy E. Miller**  
**Stuart W. Smith**  
Miller & Associates  
15005 S.W. Meadows Road, Suite 405  
Lake Oswego, OR 97035

by \_\_\_\_ having deposited in the United States Mail at Portland, Oregon a full, true and correct copy in a sealed envelope with postage prepaid, addressed as shown above, the last known address for the addressees listed;

by \_\_\_\_ having hand delivered to the attorneys shown above a full, true, and correct copy of the original.

by ☒ electronic filing.

/s James F. Halley  
James F. Halley, OSB #91175

The foregoing is a true, correct and complete copy of the original.

James F. Halley, OSB #91175

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